

EXHIBIT 3

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

)
WAYMO LLC,)
)
Plaintiff,)
)
vs.) Case No.
) 3:17-cv-00939-WHA
UBER TECHNOLOGIES, INC.,)
OTTOMOTTO LLC; OTTO)
TRUCKING LLC,)
)
Defendants.)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF PIERRE-YVES DROZ
San Francisco, California
Friday, March 31, 2017
Volume I

Reported by: SUZANNE F. GUDELJ
CSR No. 5111
Job No. 2581643
PAGES 1 - 187

1 with the noticing attorney.

2 MR. JACOBS: Michael Jacobs, Morrison &
3 Foerster.

4 MS. CHANG: Esther Chang with Morrison &
5 Foerster. 09:40:39

6 MS. DEARBORN: Meredith Dearborn of Boies,
7 Schiller & Flexner on behalf of Uber and Ottomotto.

8 MS. BARTOW: Nicole Bartow, in-house at
9 Uber.

10 MR. JAFFE: Jordan Jaffe of Quinn Emanuel 09:40:47
11 on behalf of the plaintiff and the witness.

12 MR. CORREDOR: Philip Corredor, also of
13 Quinn Emanuel.

14 MR. BERKLEY: Demarron Berkley, in-house at
15 Google. 09:40:58

16 THE WITNESS: Pierre-Yves Droz.

17 VIDEO OPERATOR: Thank you. The witness
18 will be sworn in and counsel may begin the
19 examination.

20
21 PIERRE-YVES DROZ,
22 having been administered an oath, was examined and
23 testified as follows:

24
25 EXAMINATION

1

1

██████████

114

© 2006 The Authors

██████████

114

114

1 Q When you say what you had learned from your
2 software teams, what are you referring to?

3 A They, you know, put cars on the road with
4 very different sensors.

5 (Reporter clarification.)

6 With different sensors. They evaluated a
7 lot of different possibilities for sensors that --
8 you know, they drove like millions of miles of
9 self-driving, and so from that, you know, like from
10 a lot of different scenarios that I have seen on the 10:05:21
11 road. One of the spec they gave us was kind of the
12 resolution that we need to achieve for the -- on the
13 car.

■ ■ [REDACTED]
■ [REDACTED] ■
■ [REDACTED]
■ [REDACTED]
■ ■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ [REDACTED]

7 (Defendant Exhibit 1021 marked by the court
8 reporter.)

9 BY MR. JACOBS:

10 Q Can you tell us what 1021 is, please? 10:06:51

11 A I believe 1021, I mean, looking at it, is a
12 document that I put together about a year ago to
13 support my like application for promotion in Google.

14 Q If -- I want to -- start over.

15 I'd like you to turn to the second 10:07:14
16 paragraph of the first page, please.

17 A Second paragraph of the first page.
18 Mm-hmm.

19 Q You start out by saying:

20 "In 2011, the first Google self-driving 10:07:24
21 cars were using an off-the-shelf LIDAR (the
22 Velodyne HDL64)."

23 Do you see that?

24 A Yes, I do.

25 Q So when you joined Google, Google already 10:07:34

Page 30

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

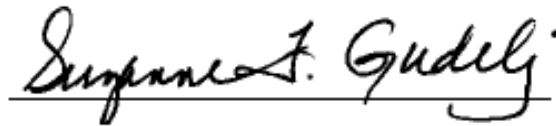
4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were duly sworn; that a record
8 of the proceedings was made by me using machine
9 shorthand which was thereafter transcribed under my
10 direction; that the foregoing transcript is a true
11 record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [X] was [] was not requested.

16 I further, certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: 4/3/17

22 
23

SUZANNE F. GUDELJ

24 CSR No. 5111